

intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include activities such as neighborhood or community policing efforts;

(b) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and

(c) to make more effective use of, and coordinate with, other programs (including state welfare reform efforts).

CSBG eligible entities and subcontractors will implement this section of the CSBG Act through many diverse programs and activities based upon the respective local needs and resources with regard to the low-income population.

CSP monitors compliance with CSBG assurances using a process designed to document program accomplishments along with planned outputs. The planned work programs outline problems, goals, target populations, strategies, and projected outcomes. The program performance and fiscal reports detail achievements, expenditures by categories, people assisted by service categories, client characteristics, and a vast array of other appropriate and pertinent information. Such reports are submitted to CSP on a monthly basis; in addition an annual report from each eligible entity and their subcontractors is required.

In terms of the range of services and activities, CSBG has historically been, and will continue to be, an extremely vital part of the human service system in Wyoming. CSBG funds are used for program operations, i.e. development, planning, implementation, operation, monitoring, evaluation, fiscal control, policy analysis, staff development, board training, needs assessments, and a myriad of other uses. These, when combined with direct client service activities, provide a comprehensive, multi-faceted approach to identifying and resolving problems and issues, and to eliminating conditions of poverty. The CSBG service delivery network is responsible for a very

wide range of activities, consistent with the CSBG Act.

Specific Activities:

The CSBG Act delineates assurances which govern the use of CSBG funds. The State of Wyoming has identified and prioritized specific problem areas as those for which services and activities are provided, and for which specific information is documented and reported. Eligible entities and their subcontractors develop specific strategies to resolve those problems.

Information and referral, advocacy, counseling, and application of assistance are strategies which ensure effective delivery of services designed to meet a wide spectrum of needs. These strategies provide essential assistance, as a prelude to solving specific problems. The following is a list of some of the programs or projects operated by local CSBG eligible entities and their subcontractors in each of the 676(b)(1) assurance area.

Removal of Obstacles to Self-Sufficiency: People in poverty situations are often at the complete mercy of the confusing and complex systems that are designed to meet their needs, but often do not (for a variety of reasons, most particularly the lack of having an advocate to emphasize self-sufficiency through the removal of the myriad of barriers or obstacles to them). The intent of the State and its CSBG programs are to strive for self-sufficiency, as opposed to a "quick fix." However, oftentimes in crisis intervention situations, a "quick fix" must occur before self-sufficiency activities are to take place.

Secure and Retain Meaningful Employment: The State and its grantees clearly recognize the obvious connection between meaningful employment and the elimination of poverty. Grantees work closely with many private and public organizations to this end. Specific employment activities include information and referral and follow-up, job counseling, job development and placement, summer youth jobs, work experience, employment generating projects, skill training, job banks, elderly jobs programs, disabled jobs programs, advocacy or brokerage, self-sufficiency programs, case management, and others.

Attain an Adequate Education: Similar to "employment," the relationship between education and elimination of poverty is evident, and is clearly recognized by the State and its grantees. Specific educational activities include information and referral and follow-up, counseling and guidance, public education and public information about poverty and related conditions, support of Head Start programs, daycare and parenting, alternative educational measures, literacy, bilingual, early childhood development, and others.

Better Use of Available Income: It is very clear that low-income people must make the best possible use of all resources that are available to them. This is why sound information and referral systems, with good follow-up capabilities are so important in assisting people with multi-problems. Some specific activities in this category include household and financial counseling, income tax counseling, energy conservation activities, public information relative to services available through all public and private means, weatherization services, alternative energy services, advocacy and brokerage, auto and home repair, consumer education and counseling, family planning, food cooperatives, farmer's markets, community gardens, and others.

Obtain and Maintain Adequate Housing: The lack of adequate and affordable housing for low-income people over the past decade has been staggering. To this end, the State of Wyoming utilizes various activities for dealing with this substantial problem. Some of those activities include information and referral and follow-up, homeowner counseling, loan assistance, landlord-tenant issues, rental and mortgage assistance, home repair, rehabilitation and weatherization, utility assistance, energy conservation activities, direct shelter activities, homeless prevention activities, and others.

Obtain Emergency Assistance: In many instances (if not most), problems encountered by low-income people need immediate resolution. This is particularly true with crisis intervention situations, i.e., the lack of food, clothing, shelter, or urgent medical needs. Traditionally, the emergency assistance category has been the largest in Wyoming's CSBG program in terms of the numbers of people served, and funds expended. Specific activities include immediate medical care, food, clothing, shelter, crisis intervention of various kinds, donations of food, fuel, gas, car or home repair, utility assistance, and others. CSBG emergency assistance is provided only as "last resort," whereby a person is not eligible for any other public or private service.

Greater Community Participation: When low-income people have no forum from which to be heard, the task of eliminating poverty becomes that much more difficult. Because of the lack of technical knowledge of governmental systems, and oftentimes a lack of self-esteem, low-income people do not participate and/or contribute to the local decision-making processes concerning issues that directly affect them and their families. Some activities designed to increase such participation in community affairs include encouraging more low-income people to become members of advisory councils, task forces, boards, and other such groups, recreational and educational activities designed for social contact and information gathering, community forums, media releases, newsletters, peer programs, VISTA Volunteers, youth development, community organizing and others. Low-income people will be heavily involved in the CSBG network through their

active participation in the tripartite governance boards, which will be used by all CSBG recipients.

Counteract Conditions of Starvation and Malnutrition: Health needs of people are crucial ones, and this is particularly true with low-income people because of their lack of resources. This becomes more crucial when those health needs relate to the lack of nutrition. Nutrition and feeding programs have escalated drastically in Wyoming's CSBG program over the years. Some of the specific activities designed to help in this area are information and referral and follow-up, nutritional counseling, surplus food distribution, congregate feeding, food banks, hot meals projects, transportation to meals projects, garden projects, food processing, food basket programs, weekend backpack programs for students, nutritional education, home-delivered meals, soup kitchens, community gardens, and others.

Conditions to be Addressed: Conditions to be addressed are as a result of needs assessments conducted by grantees. The conditions listed below are not all inclusive, but are indicative of the conditions that will be addressed. They are arranged to correspond with the three categories of CSBG national Goals: (1) individuals/families; (2) community; and (3) agency.

Conditions Relating to Individuals/Families: Poverty; Discrimination; Lack of meaningful jobs that pay good wages and benefits; Lack of support for those transitioning off welfare; Dependency on social services organizations; Limited opportunities for economic self-sufficiency for pregnant and parenting teens; Inadequate client knowledge of and access to services; Inadequate knowledge and skills to deal effectively with issues affecting safety, sanitation, and quality of life; Insufficient development and coordination of support for parents and families necessary to increase stability and self-reliance; Lack of insurance coverage.

Health: Inadequate, inaccessible, unaffordable health care; Increases in incidences of alcohol and/or drug abuse; Barriers to the testing for, and treatment of, and curbing the spread of infectious diseases; Adolescent pregnancy; Inadequate parenting skills; Pregnant youth who are at-risk; Affordable dental care for Medicaid population, particularly children; Lack of bilingual health providers; Independent living options for youth and adults; Increase in the incidence of child abuse; Increase in cases of elder abuse; Juvenile delinquency prevention; Lack of early intervention and diagnoses of disabilities in low-income children; Increase in domestic violence.

Employment: Insufficient full-time jobs with adequate wages and benefits; Inadequate employment services systems; Insufficient on-the-job training opportunities; Loss of jobs due to layoffs and reductions; Disasters; High unemployment rate; Lack of job opportunities due to state economy; Inadequate comprehensive job skills training, including survival skills,

specialized training, and training for teens; Need for higher paying jobs; Training programs to prepare low-income people for jobs; Non-traditional employment opportunities.

Education: High school dropout rate; Unprepared for workforce; Literacy and language problems; Lack of appropriate literacy and alternative education; Schools need earlier delinquency prevention; Lack of early childhood education; Inadequate education for young children; lack of adequate systems for homeless families.

Income Use: Limited knowledge about budgeting; Limited resources to purchase safety restraints or devices (i.e., car seats, bike helmets, etc.)

Housing: High cost of housing and utilities; Lack of available and/or affordable housing; Lack of permanent and safe housing; Increase in number of people who are homeless; Insufficient knowledge and resources for home ownership.

Greater Participation: Limited family counseling; Limited activities to prevent homelessness; Limited career exploration opportunities; Limited employment opportunities for seniors; Lack of adequate support systems for the elderly; Lack of access to affordable legal services; Lack of cultural enrichment; Lack of substance abuse and/or alcohol prevention; lack of recreational programs for at-risk before, after, and on holidays; Lack of transportation to Medicaid, human services, training, and work sites; Increases in the number of grandparents who are primary care givers; isolation of the elderly.

Greater Participation and Linkages: Community innovation methods to deal with lack of jobs; Need to increase networking and collaboration; Lack of public transportation; Limited resources to address racism and discrimination; lack of awareness of the services of community action agencies, and related organizations; Strained relations with minority community and increased acts of discrimination; inaccessibility of services; Lack of involvement of low-income people on policy-making boards of organizations; Unresponsive community governments; Lack of safe, and adequate, daycare.

Conditions Relating to Agency(s): Inadequate data collection and analysis; Insufficient family development/case management capacity; Lack of central intake system; Limited funds for facility maintenance and expansion; Inadequate staffing, particularly in outreach; Facilities not conducive to centralized services; Lack of computers where necessary; Turf and control problems with other organizations; Significant staff turnover; Lack of orientation for new staff and new board members; Lack of staff development and training; CSBG computer program does not track outcomes and/or case

management information; Lack of program evaluation; Obsolete management documents systems; Need more Head Start classrooms; Need training for home-based daycare businesses; Increased demand for services; Funding inadequate to meet increased demand for services; Tools to manage outcomes; Diversification of funding resources; Inadequate resources for program development and expansion; Development of managerial plan that will increase operational efficiency; Lack of formal, uncoordinated planning with other services providers, and within the agency; Under-utilization of agency and community resources; Inadequate partnerships with employers to target and generate jobs for low-income people; Barriers to providing quality client services; Inadequate knowledge of staff views regarding issues of diversity (ethnic/racial/cultural); Limited involvement of the governing board; Inadequate training for governing boards and councils; Weak interaction between area advisory councils and the board; Achieve and maintain full board membership; Greater participation in community efforts and activities; Community needs to be involved in the activity of the agency; Improved outreach and marketing; Increased need for fundraising to support program activities; Non-traditional means of obtaining resources.

Service Providers:

Providers of CSBG services and activities will be (1) eligible entities, through direct assistance to clients, and/or service providers (or subcontractors). The majority of direct client assistance will be provided by human services providers, some of them being CSBG service providers in past years, as well as some who have not been CSBG providers in the past. It is anticipated that around one hundred seventy-five (175) service providers (subcontractors) will be participants in the local CSBG programs. The service providers will be monitored by both the CSP and the respective eligible entity on a local level.

b) Coordination, Linkages, and Networking:

All CSBG eligible entities are responsible for the selection and implementation of programs that will have maximum community impact, consistent with the purposes of the CSBG. Community organization and resource mobilization are integral and invaluable parts of local CSBG operations.

Eligible entity applications, reports, and other feedback demonstrate eligible entities' and subcontractor's abilities to draw from a diverse variety of funding sources to build comprehensive programs and to manage an array of resources that will serve the needs of the community.

A detailed description of coordination, linkages, and networking for each eligible entity is a requirement for CSBG funds, and must be included as part of its community action plan which must accompany the application to CSP.

Most Wyoming counties have established groups, which serve the purpose of planning, implementing, monitoring, and evaluating their local CSBG programs. Coordination, linkages, and networking are necessary factors in establishing effective local CSBG programs for these groups.

Generally, local CSBG programs work with virtually all of the other human services programs. Because of its flexibility, the CSBG plays a key role in the resolution of poverty and associated problems in communities. Local CSBG programs routinely provide information and referral services; programs also receive referrals from other entities.

As alluded to previously, CSP reviews eligible entities' applications for funding with emphasis on the local community action plan for assessment of coordination, linkages, networking, and non-duplication of efforts. Local community action plans must show evidence of coordination and linkages with related public and private sector activities, and evidence that CSBG funded activities will not duplicate other efforts. In short, activities may supplement other efforts, but they cannot supplant.

CSP fully expects local eligible entities and their subcontractors to continue meaningful participation of public, private, and low-income sectors in the planning and operations of local CSBG programs. Through the analysis of the local problem identification and the description of the service delivery system identified in the local community action plans, the existing resources are to be identified and maximized for the most efficient and cost effective delivery of services for low-income people. The coordination and linkages necessary to achieve this will be the responsibility of the local CSBG eligible entities and their subcontractors and will be documented for each program or project.

In their application to CSP, eligible entities must provide signed assurances to the State, and how they intend to implement each assurance. These are essentially the assurances that the State provides to HHS/OCS, that are applicable to local eligible entities.

Coordination effort objectives at both the state and local levels are (1) to establish effective linkages with other programs, both public and private sectors, (2) to reduce the possibility of duplication, and (3) promote and maximize resource mobilization.

Because the CSBG Program is essentially the only one with a statutory responsibility that places emphasis on coordinating and linking the entire range of public and private resources at the state and the local levels to assist low-income people, the State's efforts in meeting this mandate have been very successful through the years.

Wyoming is fortunate to have dedicated local service providers that coordinate and link up in a meaningful fashion on behalf of their constituencies. Because of economic issues, budget cuts, and as a result, the needs of low-income people escalating, this has become a very crucial issue. CSP has had very little problem with regard to local coordination and networking issues.

While direct client assistance is the major component of Wyoming's CSBG program, advocacy, community organizing, and resource mobilization are integral parts. This link is the primary difference between the CSBG and other human services programs.

Some of the specific activities that are paid by CSBG are information, referral and follow-up provisions, local needs assessments, community outreach, human services directories, advocacy, and the general overall State emphasis of improving the coordination and networking of all public and private organizations. Some of the major programs that work closely with CSBG programs are Public Health Nursing Services, Department of Family Services, Vocational Rehabilitation, Weatherization Programs, Aging programs, JTPA (Job Training and Partnership Act) Programs, Community College Programs, Developmental Disabilities Programs, Mental Health Programs, Day Care Programs, Volunteer Feeding Programs, Ministerial Association Programs, Community Alternative Programs, Emergency Shelter Programs, Homeless Self-Sufficiency Programs, and a variety of Indian Programs.

The State ensures that the assurances with regard to activities and services, and the uses of the funds will be carried out through (1) contractual agreements with eligible entities, (2) monthly performance and fiscal reports (desk monitoring and analysis), and (3) through on-site monitoring.

Faith-Based Organizations Collaboration:

The CSBG Act requires religious organizations to be considered for CSBG funding on the same basis as any other non-governmental organization, so long as the program is implemented in a manner consistent with the Establishment Clause of the First Amendment to the U.S. Constitution. Neither the Federal Government nor the state or local governments receiving funds under the CSBG shall discriminate against an organization that provides assistance under, or applies to provide assistance

under, the CSBG on the basis that the organization has a religious character. A religious organization that provides assistance under the CSBG shall retain its religious character and control over the definition, development, practice, and expression of its religious beliefs.

The religious program may not support religious activity or compel participants to adopt or participate in religious teachings or practices. A religious organization may not use CSBG funds for sectarian worship, instruction, or proselytization. It may, however, retain its religious character and not be forced by any government to alter its form of governance (other than creating a Tripartite Board) or remove religious art, icons, scripture, or other symbols.

Religious organizations may now be designated as new eligible entities in unserved areas, but only if all the requirements applicable to other private non-profit organizations, such as a Tripartite Board, location in the geographic area to be served, ability to provide a broad range of services designed to eliminate poverty and foster self-sufficiency, and demonstrated effectiveness in meeting CSBG goals and purposes, are met.

No funds provided directly to a religious organization to provide assistance under the CSBG shall be expended for sectarian worship, instruction, or proselytization.

Any religious organization providing assistance under the CSBG shall be subject to the same regulations as other non-governmental organizations in terms of fiscal accountability, in accordance with generally accepted accounting principles for the use of CSBG funds.

The religious organization must segregate government funds provided under the CSBG into a separate account. Only the CSBG government funds shall be subject to audit by federal, state, or local governments.

If an eligible entity or other organization (such as subcontractors, or consulting groups, referred to in the CSBG Act as "intermediate organizations"), acting under a contract, or grant or other agreement, with the federal state, or local governments, is given the authority under the contract or agreement to select non-governmental organizations to provide assistance under the CSBG, the intermediate organization shall have the same duties as the Federal, state, and local governments.

For any program carried out by the Federal Government, or by a state or local government under this subtitle, the government shall consider, on the same basis as other non-governmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the

first amendment of the Constitution. Neither the Federal Government nor a state or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.

A religious organization that provides assistance under a program described in Section 679, subsection (a) of the Act shall retain its religious character and control over the definition, development, practice, and expression of its religious beliefs.

Neither the Federal Government nor a state or a local government shall require a religious organization--

- to alter its form of internal governance, except (for purposes of administration of the Community Services Block Grant) as provided in section 676B; or
- to remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).

A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).

CSP will continue to solicit from, and encourage participation by, appropriate religious organizations in the state (i.e., the Wyoming Church Coalition and other such groups) for the potential of becoming CSBG eligible entities. Historically, the State has worked for a number of years with religious organizations as service providers, including several Salvation Army Unities, Cooperative Organizations Ministry for Emergency Assistance (COMEA) in Cheyenne, Mother Seton House and the Central Wyoming Rescue Mission in Casper, and several Inter-Faith Organizations.

c) Coordination with Other Public and Private Resources:

The State ensures coordination between anti-poverty programs in each community in the state, and also ensures that emergency energy crisis intervention programs are conducted in such communities. This will be verified through local applications, desk monitoring (monthly reports), and on-site monitoring.

CSP is involved with many public and private sector groups (both formalized and informal) that relate to the purposes of the CSBG. The improvement of coordination and networking on both the state and local level is a top priority for the CSP.

CSP review of CSBG applications includes assessment of the following:

(1) Coordination and Non-duplication of Efforts

- (a) Evidence of coordination and linkages with related public and private activities, and evidence that CSBG funded activities will not duplicate other agencies; however, activities can supplement efforts, but not supplant.

CSP fully expects local grantees to continue soliciting meaningful participation from the public, private, and low-income sectors in the planning and operations of CSBG programs. Through the analysis of the local problem identification and the description of the service delivery system identified in local community action plans, existing resources are to be identified and maximized for the most efficient and cost effective delivery of services to low-income people. The coordination necessary to achieve this will be the responsibility of the local grantees and will be documented for each project.

(2) Coordination objectives at both the state and local level are as follows:

- (a) To establish effective linkages with other state and local programs in both the public and private sectors;
- (b) To reduce the possibility of duplication; and
- (c) Promote and maximize resource mobilization.

Because of diverse funding sources, the prospect of achieving the above goals is greatly enhanced.

Homeless Programs:

Even though Wyoming has not undergone the crisis proportions of homelessness suffered by large urban areas, the incidence of it has escalated drastically since the early 80s. This is primarily due to the ever-sagging Wyoming economy brought on primarily by the international and national energy situation, the demolition of older, low-cost hotels and boarding homes, and the serious lack of affordable housing for its citizens. It is also

believed that the nationwide shortage of affordable housing has compounded Wyoming's problems. Furthermore, the southern part of the state has traditionally been heavy traffic for homeless persons simply because of its location -- a crossroads for travel across the length and breadth of the nation (which dates back to the days of the pioneers). Today, the city of Cheyenne is traversed by two major transcontinental highways, as well as routes of other commercial carriers. This central location makes the transient homeless issue particularly apparent in Cheyenne. Further, many local Wyoming residents are homeless, or in the stage of becoming homeless, primarily due to Wyoming's economy.

Wyoming's homeless tend to fall into three categories; (1) people who suffered fairly recent economic setbacks, and/or eviction or imminent eviction from their homes; (2) people who have experienced severe personal crises, i.e., divorce, domestic violence, incarceration, hospitalization, being stranded; and (3) people who are chronically mentally ill and/or struggle with substance abuse.

CSP has worked, and will continue to work, very closely with all homeless/shelter programs. These programs simply could not work in Wyoming without the help of the CSBG network. Homeless program funding in Wyoming is minimal.

Hunger/Feeding Programs:

Hunger is clearly one of the most visible and key elements of poverty. Many people are unable to eat adequately or nutritiously because of the lack of resources. The "emergency assistance" category is one of the most used in Wyoming's CSBG program. Within that, "health services" are the most used, both in terms of funds spent and people served. Peoples' health is clearly the top priority in Wyoming's CSBG program, and the provision of nutrition and food services are crucial to health.

d) Innovative Community and Neighborhood Initiatives:

CSP will strongly encourage local eligible entities and their subcontractors to initiate innovative community and neighborhood-based initiatives related to the purposes of the CSBG, which may include fatherhood initiatives, where necessary, and other initiatives with the goals of strengthening families and encouraging effective parenting.

A description of how local CSBG programs will perform these initiatives must be included in their local applications to CSP, and through their respective community action plans. Eligible entities must also sign assurances with regard to these initiatives.

2. Community Needs Assessments:

The CSBG Act requires the State to "secure from each eligible entity in the state, as a condition to receipt of funding, a Community Action Plan that includes a community-needs assessment for the community served, which may be coordinated with community needs assessments conducted for other programs."

The State ensures that it will comply with this assurance through the application approval, contract, and monitoring process. Needs assessments are but one component of the Community Action Plans. Community Action Plans including their key component, the needs assessment(s), are a requirement for CSBG funding. Needs assessments must be included in the eligible entities' respective Community Action Plans, and submitted to CSP for approval. As well as the needs assessment data, there will be a full description of the type of needs assessment performed, the methodology, and other pertinent information. No contract for CSBG funds from the State to an eligible entity will be executed unless the needs assessment requirements are fully met. Assessments will be analyzed by CSP commensurate with an eligible entities' application and plans for CSBG activities to ensure that CSBG program activities and services are based on identified needs from the assessment(s). Further, needs assessment assurance will be reviewed at on-site monitoring visits.

CSP requires that a new needs assessment be performed every three (3) years, with an update for the two years in between. It is possible, if unique situations and conditions occur in a respective community, that a new needs assessment be conducted prior to the 3 year intervals. As such, the requirement for a new needs assessment every three years does not preclude local eligible entities from establishing a new (as opposed to an updated) needs assessment more frequently.

3. Tripartite Boards:

The State assures that each eligible entity establishes procedures under which a low-income individuals, community organizations, religious organizations, and representatives of low-income individuals are adequately represented on the board (or other mechanism) of the eligible entity. Where this representation does not exist, individuals are encouraged to petition the board for adequate representation.

CSP will ensure compliance with this assurance through the verification of Tripartite Board establishment documents and monitoring. The establishment of such procedures in the assurance will be a requirement for eligible entities in the establishment process of their Tripartite Board in addition to other requirements, as appropriate. In addition, eligible entities must submit signed assurances to CSP as the State's assurances to the HHS/OCS (as applicable), and this assurance is clearly applicable. They must describe how they will carry out this assurance through their respective Tripartite Board eligible entity designation or re-designation (as appropriate) request for CSBG funds.

Section 676B of the CSBG Act requires that, in order for a private non-profit entity or public organization to be considered to be an eligible entity for the purposes of the CSBG Program, it must administer the CSBG through a Tripartite Board or another mechanism specified by the State. It must be noted that it is the policy of the State that no organization, public or private, will be designated as an "eligible entity" for CSBG purposes unless a formal Tripartite Board is not only established, but operates as a Tripartite Board consistent with the Congressional intent, the CSBG Act, and the State Plan with respect to the process for its establishment, and its overall role and purposes for governance and administration of the CSBG Program.

The State of Wyoming's CSBG entities will represent and are accountable to their local communities for the manner in which they pursue their poverty-fighting mission, as well as in the way they use the resources of the CSBG. By statute, CSBG-funded agencies will be governed by a board of directors consisting of elected local public officials, representatives of the low-income community, and appointed leaders from the private sector. This unique Tripartite Board structure is fundamental to the historical Community Action concept. It empowers low-income people to participate directly in the development of responses to poverty conditions; at the same time, private and public representatives gain more knowledge about the issues confronting low-income people in their community. These members offer their unique expertise to the policy-making, business planning, and operational aspects of the eligible entities.

- Private non-profit agencies: In order for a private non-profit entity to be considered to be an eligible entity for purposes of the CSBG, the entity will administer the CSBG through a Tripartite Board that fully participates in the development, planning, implementation, monitoring, and evaluation of the program to serve low-income communities. The members of the board will be selected by the entity, and the board will be composed of (A) one-third (1/3) elected public officials holding office on the date of selection to the board, or their representatives, except that if the number of such elected officials reasonable available and willing to serve on the board is less than one-third (1/3) of the membership of the board, membership on the board of appointive public officials or their representative may be counted in meeting such one-third (1/3) requirement; (B) not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and each representative of low-income individuals and families selected to represent a specific neighborhood within a community resides in the neighborhood represented by the member; and (C) the remainder of the members are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

- Public Organizations: In order for a public organization to be considered as a CSBG eligible entity, the entity shall administer the CSBG through (1) a Tripartite Board, which shall have members selected by the organization and shall be composed so as to assure that not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these

members (A) are representative of low-income individuals and families in the neighborhood served; (B) reside in the neighborhood served; and (C) are able to participate actively in the development, planning, implementation, monitoring, and evaluation of programs under the CSBG; or (2) another mechanism specified by the State to assure decision making and participation by low-income individuals in the development, planning, implementation, monitoring, and evaluation of programs under the CSBG.

CSP intends to ensure that its assurance to HHS/OCS for Tripartite Boards is carried out through various ways. First, local eligible entities must submit signed assurances to CSP, with the Tripartite Board assurance being one of them. As part of an eligible entity's application to CSP for CSBG funds, it must have first been designated as an eligible entity by CSP. From a timing perspective, those agencies choosing to become eligible entities by establishing a Tripartite Board should have been designated several months before the funding application to the State is due. However, those still in process of establishing a Tripartite Board at application time will be considered, but will not be provided any CSBG funds until the board is established, and formally designated as an eligible entity by CSP.

Information and documents required by CSP for approval (or designation) of an entity's Tripartite Board status include:

- copy of signed resolution formally approved by the entity's governing board to form a Tripartite Board for CSBG purposes;
- official name of the governing board/entity;
- copy of approved and signed by-laws that clearly state the intent, purposes, roles, and responsibilities of the board for CSBG purposes, as well as other appropriate information generally associated with organizational bylaws;
- copy of Articles of Incorporation (501(c)(3) status (for Private Non-profit Corporations only);
- a list of the board members, their terms of office, what category of the Tripartite Board they represent, identified by name, address, phone number, job title, and employer;
- an explanation of how members were appointed to the board consistent with the CSBG Act;
- a description of the procedures in place (from the bylaws) to ensure that low-income individuals, community organizations, and religious organizations can petition for adequate representation on the board if such individual or organization considers itself to be inadequately represented;
- a description of how the board will fully participate in the (1) development, (2) planning, (3) implementation, (4) monitoring, (5) evaluation, and (6) overall management of its CSBG programs;
- evidence that the organization has the capacity to deliver a broad range of services;

- a description of the process for solicitation of board members, election of board members, appointment of members, how board vacancies will be handled, terms of office, board meeting frequency, verification through newspaper articles or flyers, etc.;
- assurances by the board (from the bylaws) that all meetings will be conducted formally (i.e., official minutes of proceedings, Roberts' Rules of Order, and other generally accepted board principles);
- a description of where professional board files will be kept (i.e., CSBG documents, board minutes, program reports, and other appropriate documents);
- a list of board officers and contact information (i.e., chairperson, co-chairperson, secretary, treasurer, and length of terms and brief (board) job descriptions or roles and responsibilities);
- a description of what individuals will be performing what types of day-to-day tasks for the board (i.e., CSBG financial and performance reporting, overall management and administration, preparation of materials for board members and related areas);
- how the board will develop policies (for the bylaws) that address possible "conflicts of interests" issues with regard to board members (i.e., representatives of human services provider agencies (CSBG subcontractors) cannot be board members, no clients of human services provider agencies (CSBG subcontractors) can be board members), or any other areas where a potential board member or a sitting board member may be subject to a conflict of interest;
- a detailed description of the process the board will go through to formulate the community action plan, which is the primary part of the local application to the CSP for CSBG funding (In short, the community action plan will state how and why decisions were made as to what types of local CSBG programs or projects were chosen to be funded, *Wyoma* planning information, and related planning information.);
- a description of the process that will be used by the board to provide "board orientation" to new members relating to board practices, CSBG operations, and other appropriate information;
- assurances that each board member will receive a copy of the CSBG Tripartite Governing Board Manual that was developed by CSP; and
- any other documentation that helps describe the eligible entity and its operations.

CSP intends to carry out its obligation to HHS/OCS with regard to the Tripartite Board assurance through review of prospective eligible entities' grant applications which are required and via signed assurances from eligible entities that describe how they will carry out the tripartite assurances.

Training and technical assistance is available for eligible entities, from both the public and private sector, to establish and maintain their respective tripartite governing boards. Such training and technical assistance is available from the CSP.

Community Action Agencies:

By definition, a Community Action Agency (CAA) is a private non-profit organization whose mission is to reduce the causes and conditions of poverty in its geographic coverage area, whose board is broadly representative of three community sectors--(1) low-income people, (2) private organizations, and (3) public agencies--and whose status as a CAA is the result of an explicit designation as such by a local or state government. The board referred to is the tripartite governing board which all CSBG eligible entities must be governed by and through.

In terms of its structure and mode of operation, a CAA:

- serves the entire low-income population in a designated geographic area;
- involves low-income people in planning, administering, and evaluating its programs;
- has a governing board consisting of 1/3 democratically selected (voting) members that represent low-income people, 1/3 local public officials of their designees, and 1/3 representatives of business, industry, labor, religious, law-enforcement, social welfare, or other groups in the community;
- has received designation as a CAA by local government under the provisions of the Economic Opportunity Act of 1964;
- is recognized as an eligible entity as defined in the Omnibus Budget Reconciliation Act of 1981, as amended, and can therefore receive funding through the State under the CSBG;
- belongs to a national network of similar agencies that, for the most part, received their initial designation by local government, federal recognition, and funding under the Economic Opportunity Act of 1964, as amended.

A CAA carries out its mission through a variety of diverse means that include (a) community-wide needs and resources assessments (or resource inventories or directories); (b) comprehensive anti-poverty plans and strategies; (c) a broad range of direct and indirect (information and referral) services; (d) mobilization of financial and non-financial resources; (e) advocacy on behalf of low-income people; and (f) partnerships with other community-based organizations to eliminate poverty.

Most poverty-related organizations or programs focus on a specific or categorical area of need, (i.e., job training, substance abuse, health care, housing, economic development). CAAs reach out to all low-income people in their communities, address multiple needs through a comprehensive approach, develop partnerships with other community institutions, involve low-income clients in the agency's operations, and administer a full range of coordinated programs aimed at

having a measurable or potentially measurable impact on poverty; with the ultimate goal of self-sufficiency for low-income individuals or families.

Wyoming currently has three (3) CAA's; (1) Community Action of Laramie County, Inc. (CALC), located in Cheyenne, (2) Northwest Community Action Programs of Wyoming, Inc. (NOWCAP), located in Worland, and (3) Community Action Partnership of Natrona County (CAPNC), located in Casper.

The first two were designated as a CAA in late 1967 through the Green Amendment passed by the U. S. Congress. Soon after that, Congress passed the Quie Amendment which mandated the tripartite governing board requirement. The third CAA (in Casper) was so designated on May 7, 2001.

Under the CSBG Act, the State has the sole authority and responsibility to designate an entity as a Community Action Agency. Legally, there is no local (municipal or county) designation, although a CAA may need a local government's approval to fill its public sector seats on their governing board. It is not a federal regulation that local government needs to give approval for a new prospective Community Action Agency.

Technically, the designation the State makes is to designate an organization as a "CSBG eligible entity" rather than as a CAA. Here are the requirements that have to be met for the State to designate an organization as a CSBG eligible entity.

- The organization must be in an area that is not served or ceases to be served by an eligible entity. An agency cannot be designated an eligible entity where one already exists, unless the CSP de-designates the original eligible entity or the existing agency relinquishes.
- The organization must be either geographically located in the area to be served, or be a previously-existing eligible entity in a contiguous or nearby area that will provide services to the area to be served.
- The organization has demonstrated effectiveness in meeting the goals and purposes of the CSBG.
- The State may give priority to existing eligible entities that are already providing related services in the unserved area.
- The State may designate a political subdivision (unit of government) as an eligible entity only if it determines that there is no qualified non-profit organization.
- And, of course, the eligible entity must meet the Tripartite Board composition requirements and the board must "fully participate" in the development, planning, implementation, and evaluation of programs serving low-income people and communities.
- The entity must be capable of providing a "wide and broad range of services" as opposed to limited, categorical services.

Eligible entities that want to become an official CAA must submit a request to the CSP. The primary decision is based on how an applicant demonstrates its ability to achieve the mission of a CAA.

Entities, be they public or private, considering requesting status as a CAA should contact the CSP for further details.

Designation of Community Action Agencies:

The CSP will consider requests for formal CAA designation on an individual basis, as consistent with federal direction and mandate. It must be made clear that an organization, be they public or private, is not necessarily a CAA simply because they operate under the tripartite governing board concept. The following information should help in determining what criteria the CSP will use in determining requests for official CAA status.

What is a Community Action Agency?: Community Action Agencies are private non-profit or public organizations that were created by the Federal Government in 1964 to combat poverty in geographically designated areas. Status as a CAA is the result of an explicit designation by local and state government. A CAA has a Tripartite Board structure that is designated to promote the participation of the entire community in the reduction or elimination of poverty. CAA's seek to involve the community, including elected public officials, private sector representatives, and especially low-income residents, in assessing local needs and attacking the causes and conditions of poverty.

Purpose and Mission: In order to reduce poverty in its community, a Community Action Agency works to better focus available local, state, private, and federal resources to assist low-income individuals and families to acquire useful skills and knowledge, gain access to new opportunities and achieve economic self-sufficiency.

Structure: A CAA:

- has received designation as a Community Action Agency either from the local and state government under the provisions of the Economic Opportunity Act of 1964, or from the state under the CSBG Act of 1981, as amended;
- is recognized as an eligible entity as defined in the CSBG Act and can receive funding from the state under the CSBG;
- has a governing board consisting of at least one-third democratically selected representatives of low-income people, one-third local public officials or their designees, and the remainder representatives of business, industry, labor, religious, social welfare, and other private groups in the community; and
- belongs to a national network of similar agencies, the majority of which received their initial designation, federal recognition and funding under the amended Economic Opportunity Act of 1964.

Mode of Operation: A CAA carries out its mission through a variety of means including (a) community-wide assessments of needs and strengths, (b) comprehensive anti-poverty plans and strategies, (c) provision of a broad range of direct services, (d) mobilization of financial and non-financial resources, (e) advocacy on behalf of low-income people, and (f) partnerships and other community-based organizations to eliminate poverty. A CAA involves the low-income population it serves in the planning, administering and evaluating of its programs.

Why Community Action Agencies Are Unique: Most poverty-related organizations focus on a specific area of need, such as job training, healthcare, housing, or economic development. CAA's reach out to low-income people in their communities, address their multiple needs through a comprehensive approach, develop partnerships with other community organizations, involve low-income clients in the agency's operations, and administer a full range of coordinated programs designed to have a measurable impact on poverty and related conditions (i.e., the "working poor").

Who Wants to Be, and What Does it Take to Become a Community Action Agency?: Under the CSBG Act, as amended (the latest being P.L. 105-285), the respective state has the sole authority and responsibility to designate an eligible entity to serve an unserved or underserved area. Legally, there is no local (i.e., county designation) although a prospective Community Action Agency may need a local government's tacit approval to fill its public sector seats on the board.

Technically, the designation the state makes is to designate an organization as a "CSBG eligible entity" rather than as a Community Action Agency. The phrase "Community Action Agency" is almost nonexistent in the current version of the CSBG Act. The following are the requirements that have to be met for the State of Wyoming, through CSP, to designate an organization as a "Community Action Agency," along with correlating "eligible entity" information.

- The organization must be in an area that is not served or ceases to be served by an eligible entity. An agency cannot and will not be designated an eligible entity where one already exists, unless the CSP office de-designates the original eligible entity or the existing agency relinquishes.
- The organization must be either geographically located in the area to be served, or be a previously-existing eligible entity in a contiguous or nearby area that will provide services to the area to be served.
- The organization has demonstrated effectiveness in meeting the goals and purposes of the CSBG.
- The State may give priority to existing eligible entities that are already providing related services in the unserved area.
- The State may designate a political subdivision (unit of government) as an eligible entity only if it determines that there is no qualified non-profit organization.

- The eligible entity, of course, must meet the Tripartite Board composition requirements and the board must "fully cooperate" in the development, planning, implementation, and evaluation of programs serving low-income people and communities.
- The eligible entity board must have the capability, on their own, regarding staffing and capabilities to operate as a "Community Action Agency" (i.e., to provide a wide and broad range of services, to operate on its own, and fully perform the duties and responsibility of a full-range Community Action Agency.
- An applicant for Community Action Agency designation must demonstrate how it will achieve the mission of a Community Action Agency. It must demonstrate further that it can comply with the requirements of the CSBG statute and the State requirements and that it has local support. Applications will individually be evaluated and scored, but all applicants who meet the minimum qualifications are eligible for request for Community Action Agency designation. The CSP will then make the final decision. Hypothetically, if an eligible entity applies for Community Action Agency designation, and the request is not approved (for whatever reason), the respective eligible entity will have further opportunity to submit further requests based upon the criteria established by the CSP.

Tripartite Governing Board Manual:

During FFY 2012, CSP completed and distributed a CSBG Tripartite Governing Board Manual to the Tripartite Boards and Community Action Agencies to use to establish, maintain, and improve their boards. Copies of the Manual are available from CSP. A summary of the contents of the Manual follows:

Purpose of the CSBG Tripartite Board, Eligible Entity Status and Requirements for such Designation, Roles and Responsibilities of the Tripartite Board Members, Board Rules and Procedures and the Board Handbook, Board Fiscal Policies and Procedures and Compliance, Goals of Wyoming's CSBG Program and WyoROMA, Importance of the Needs Assessment and the Development of the Community Action Plan, State and Local Application Process, Responsibilities of the Tripartite Board and Sub-Grantees when accepting CSBG Funds, and Annual Compliance Monitoring.

Training and Technical Assistance:

WDH/CSP intends to furnish prospective grantees, grantees, and subcontractors with meaningful technical assistance and/or training to the degree necessary and practical. This will be accomplished partially through the "5% Federal Discretionary," as well as through WDH/CSP Administrative funds.

It is anticipated that the majority of such requested assistance will be in the areas of; establishment and operation of tripartite governing boards, Information Systems (IS) Survey Compilation Report, Community Action Plans, Needs Assessments, Governing Board operation, grant-writing, fund-raising, contract management, economic and community development, welfare reform coordination, minority youth development, problem solving, improvement of local infrastructures, transportation systems for the low-income, elderly and the handicapped, homeless issues, cultural, social and programmatic issues associated with Native Americans, and other appropriate areas associated with poverty and related issues.

4. Charity Tax Program:

The CSBG Act provides for charity tax credit designed to increase charitable contributions to organizations which assist low-income people. The theory is that using CSBG funds to reimburse states for revenue lost as a result of charity tax credits will encourage more states to adopt the tax credit, which in turn will encourage more individual charitable contributions to charities serving the poor.

The provision allows such states to use for any purpose (except legal assistance and tuition vouchers) that portion of their CSBG allocation not distributed to eligible entities which is equal to or less than the amount of tax revenue lost as a result of the credits for certain charitable contributions. In other words, the State may use the 10% of CSBG funds it is not required to distribute to eligible entities.

To qualify, the contribution must be made to a tax-exempt charity, eligible entity, or public housing agency which assists low-income people.

The State of Wyoming is currently not involved in the Charity Tax Credit Program inasmuch as the provision applies only to those states which give income tax credits (as opposed to deductions) from taxable income to taxpayers for charitable contributions.

5. Programmatic Assurances:

Assurance 1 - Program Purposes/P.L. 105-285, 676(b)(1)(A)(i-viii)(B)(i-ii)(C)

(1) Funds made available through the grant or allotment will be used:

(A) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to enable the families and individuals to:

(i) (SELF-SUFFICIENCY) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a state program carried out under part A of Title IV of the Social Security Act);

(ii) (EMPLOYMENT) secure and retain meaningful employment;

(iii) (EDUCATION) attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;

(iv) (INCOME MANAGEMENT) make better use of available income;

(v) (ADEQUATE HOUSING) obtain and maintain adequate housing and a suitable living environment;

(vi) (EMERGENCY ASSISTANCE) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and

(vii) (GREATER PARTICIPATION) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

(B) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life

skills training, job creation, and entrepreneurship programs); and after-school child care programs; and

(C) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts).

Assurance 1 Compliance: All recipients of CSBG funds submitted highly detailed work plans, budgets, and other appropriate information detailing the programs, projects, services, and activities to be conducted using CSBG funds. Such local plans were approved by the grantee(s) board of directors prior to submission to CSP. They were then reviewed and approved by CSP prior to submission as part of the CSBG contract and payment system. In those cases where corrective action was necessary, no local applications/work plans were approved by CSP until such corrective action was provided. Program implementation is monitored regularly.

Assurance 2 - State Use of Federal Discretionary Funds/P.O. 105-285, 676(b)(2)

(2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance with the community services block grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant program.

Assurance 2 Compliance: All decisions have not yet been made as to the specific programs and projects under the discretionary funds component. Ultimately, funds will be used for (a) training and technical assistance; (b) coordinating state-operated programs, as well as local programs; (c) support of state-wide coordination among eligible entities and subcontractors; (d) support of individual development account and other asset-building programs; (e) analyzing distribution of State CSBG funds to determine if funds have gone to areas with the greatest need; and (f) support of other activities that are consistent with the intent and purposes of the CSBG. It is expected that a substantial amount of these funds will be used for training grantee boards of directors, orientation of grantee executive directors, and fiscal officers, to support the activities of state-wide CSBG work groups, and to provide appropriate resource documents to grantee(s) boards and staffs.

Assurance 3 - Use of Grantee Information/P.L. 105-285, 676(b)(3)

(3) To provide information provided by eligible entities in the State, including:

(A) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 676(C)(a) of the Act, targeted to low-income

individuals and families in communities within the state;

(B) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;

(C) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and

(D) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the CSBG, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting.

Assurance 3 Compliance: All the aforementioned information is provided by grantees and subcontractors for use in developing the State CSBG Management Plan.

Assurance 4 - Nutrition Services/P.L. 105-285, 676(b)(4)

(4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.

Assurance 4 Compliance: The direct provision of services and activities is implemented by grantees. Nutritional services and activities are a significant portion of the CSBG expenditures, and have been for the past 3 years based on reporting.

Assurance 5 - State coordination/Linkages/P.L. 105-285, 676(b)(5)

(5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998.

Assurance 5 Compliance: CSP collaborates with all appropriate parties to provide training, information, and technical assistance to grantees. CSP will continue to work with all relevant state and local agencies, both public and private, to ensure coordination of services, and to avoid duplication.

Assurance 6 - Coordination, Energy Programs/P.L. 105-285, 676(b)(6)

(6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities.

Assurance 6 Compliance: CSP provides electronic access to the State CSBG Management Plan and solicits for comments. CSP works with CSBG grantees, such as those who administer the low-income energy assistance program, to ensure coordination of services.

Assurance 7 - Cooperation with Federal Investigations/P.L. 105-285, 676(b)(7)

(7) To permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act.

Assurance 7 Compliance: Full cooperation in the event of an investigation is assured. All requested documents, books, and records will be made available. Appropriate staff support will be provided.

Assurance 8 - Termination of Funding/P.L. 105-285, 676(b)(8)

(8) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant Program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act.

Assurance 8 Compliance: CSP has processes for (1) Client or Applicant Appeal Process, and (2) Grantee/Subgrantee Appeal Process. The Grantee/ Subgrantee Appeal Process incorporates the language in P.L. 105-285 with regard to termination of funding to an eligible entity. The processes are included at Appendix L. The State CSBG Plan identifies four areas of default:

- 1) Contractor persistently disregards laws, rules, ordinances, regulations or orders of any public authority having jurisdiction;
- 2) Performance of the work fails to substantially conform to the requirements of the contract documents;
- 3) Contractor abandons or refuses to proceed with any or all of the work;
- 4) Contractor performs work in which officers or employees of the contractor have a direct interest that would result in conflict of interest.

Should default leading to suspension or termination of funds occur, the hearing procedure mentioned above would be used. Prior to initiating the termination process, CSP would provide the eligible entity or subcontractor with opportunities to correct the situation(s). Technical assistance and support would be provided and OCS/HHS would be informed of the issue(s) and provided with copies of all correspondence, including the grantee improvement plan and the CSP support plan.

Assurance 9 - State Agency Collaboration/P.L. 105-285, 676(b)(9)

(9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.

Assurance 9 Compliance: At the state and local level, the CSBG works closely with virtually all of the state's human services programs, both public and private.

Assurance 10 - Board Representation-Petition/P.L. 105-285, 676(b)(10)

(10) To require each eligible entity in the state to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.

Assurance 10 Compliance: All grantees are required to include language in their bylaws and board policies to allow groups and individuals to petition for representation on the boards of directors. This is required by CSP as part of grantees' local funding applications. This process is monitored. Further, CSP extends invitations to the partners listed in this assurance to participate in local training conducted for grantee boards of directors.

Assurance 11 - Community Action Plans/P.L. 105-285, 676(b)(11)

(11) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community needs assessment for the community served, which may be coordinated with community needs assessments conducted for other programs.

Assurance 11 Compliance: The CSBG annual funding application package serves as the essential basis of the community action plan. All local community action plans, including respective local needs assessments are available for inspection or for submission, as required. All community action plans, at a minimum, include:

- (a) a community needs assessment (including food needs);
- (b) a description of the service delivery system targeted to low-income individuals and families in the service area;
- (c) a description of how linkages will be developed to fill identified gaps in service through information, referral, case management, and follow-up consultations;
- (d) a description of how funding under the CSBG Act will be coordinated with other public and private resources; and
- (e) a description of outcome measures to be used to monitor success promoting self-sufficiency, family stability, and community revitalization.

Assurance 12 - Participation in ROMA/P.L. 105-285, 676(b)(12)

- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act.

Assurance 12 Compliance: The State of Wyoming started participating in ROMA in FFY 99. Wyoming has adopted all six CSBG National Goals and contractors are providing data as required for National Performance Indicator forms. Grantee work plans, budgets, and monthly reports are all centered on these goals and outcome measures. Wyoming's ROMA system is, essentially, a combination of three components closely blended together to achieve the *WyoROMA* system: (1) the traditional CSBG planning and reporting system; (2) the Wyoming Governor's Strategic Planning management system; and (3) the CSBG Results-Oriented Management and Accountability (ROMA) system. *WyoROMA* was approved by HHS beginning in FY 99 and is still currently being used in the FFY 2015 program. Detailed information regarding *WyoROMA* is included in the *WyoROMA* Section of this State Plan. Because Wyoming's system incorporates strategic planning with the reporting requirements of ROMA, it is the "best of three worlds" and works very well for Wyoming.

Assurance 13 - Program Information Description/P.L. 105-285, 676(b)(13)

- (13) To provide information describing how the State will carry out these assurances.

Assurance 13 Compliance: This State Plan includes detailed descriptions of the activities of the State, its grantees, and subcontractors, documenting how the State will carry out all required assurances.

G. Fiscal Controls and Monitoring

1. State Financial and Performance Reporting:

As part of local grantees' (eligible entities) applications for funding, it is required that each application address specifically how their local fiscal and program performance reporting system will function (particularly with regard to subcontractor service delivery organizations) and how that relates to the composite eligible entity monthly reports required by WDH/CSP.

On the "Performance" side, forms reflect clients served by month, and accumulative-to-date counts; the *WyoROMA* portion reflects the six national goals; and demographic client characteristics (i.e., gender, age, race, education, family structure, income and sources, housing status, and other) are recorded.

On the "Fiscal" side, forms reflect the budget as requested and approved by line item. A compiled budget for the eligible entity, as well as a budget from each subcontractor is submitted with the annual application.

On a monthly basis, expenditure and programmatic reports are submitted to CSP. These reports are completed by subcontractors and a compiled report is submitted to CSP by the 10th of each month for the preceding month. Expenditure reports indicate the current month expenses, year-to-date expenses for the grant term and percent expended for the grant year by line item. Programmatic reports include the total amount of unduplicated clients served for the current month during this grant term and the year-to-date total. Also included are the total amount of clients served and services provided for the month and year-to-date. The number of youth (age 12-18) and seniors (55+) served are reported and include the dollar amount related to those activities and/or services.

All eligible entities and service providers (subcontractors), as federally mandated, are required to collect, maintain, compile and submit the demographic, programmatic, and financial data required for the annual National Performance Indicator (NPI) reports. These reports are submitted to CSP and a compiled report for Wyoming is submitted to the National Association for State Community Services Programs.

Monitoring/Performance:

The state lead agency for conducting reviews of eligible entities (including subcontractors, or service providers) is CSP.

CSP will comply with the federal requirements regarding reviews; however, CSP may perform on-site reviews on a more frequent basis if individual program circumstances warrant "special" reviews.

The revised CSBG Act now requires the State to monitor eligible entities and their subcontractors (service providers) in order to determine whether they meet the performance goals, administrative standards, financial management requirements, and other federal and state requirements. The State must, at a minimum:

1. Conduct a full on-site review of each eligible entity at least once during a three (3) year period;
2. Conduct a full on-site review of each newly designated eligible entity immediately after the completion of the first year in which such entity receives funds through the CSBG program;
3. Provide follow-up reviews, including prompt return visits to eligible entities and their subcontractors, that fail to meet the goals, standards, and requirements established by the CSBG Act and the State Plan (to be conducted as necessary);
4. Provide other reviews as appropriate, including reviews of eligible entities and their subcontractors that have had other federal, state or local grants terminated for cause (to be conducted as necessary); and
5. Specify the date of the last audit conducted and the period covered by the audit for each eligible entity.

Further, even if an entity's grant has not been terminated, but if it appears that there is significant management, programmatic, or financial problems, CSP may perform a "special" review, as appropriate.

In addition, as in the prior versions of the Act, the HHS/OCS must conduct evaluations and investigations of the use of CSBG funds each year. HHS must submit to the State a report of the evaluation and recommendations for improvements, as necessary. The State must then submit to HHS a plan of action in response to the recommendations, as appropriate. The evaluation results must then be included in the annual report by HHS to the U.S. Congress.

The following is a schedule of on-site reviews that have been conducted or are scheduled to be conducted:

CSBG eligible entities scheduled to be monitored in calendar year 2014:

Big Horn County
Crook County Council of County Services
Lincoln County
Yellowstone Country Assistance Network (Park)
Platte County Tripartite Board
Sublette County
Sweetwater County Tripartite Board
Human Services Tripartite Board of Uinta County